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Attorney for Defendant

FILED
DISTRICT COURT OF GUAM

MAY 11 2016 *mba*

JEANNE G. QUINATA
CLERK OF COURT

DISTRICT COURT OF GUAM

UNITED STATES OF AMERICA,)	Crim. Cases Nos. 07-00111 and
	(08-00013
Plaintiff,)	
	(MOTION FOR RELEASE
vs.)	
	(
JOSHUA J.C. ULLOA,)	
	(
Defendant.)	

Defendant respectfully moves for an order releasing him pending the determination of the petition for the revocation of his supervised release.

The motion is made on the ground that Defendant will not flee or pose a danger to any other person or to the community.

The motion is based on the original of a statement generated by Defendant himself (a copy of the original is attached hereto as Exhibit A); a transcription of the original (a copy of the transcription is attached hereto as Exhibit B); a letter from a certain Phillip Martineau to U.S. Magistrate Judge Joaquin V.E. Manibusan of May 10, 2016 (a copy of the letter is attached hereto as Exhibit C); the

ORIGINAL

(MOTION FOR RELEASE)

Crim. Cases Nos. 07-00111 and 08-00013

records and files herein; and such arguments and other evidence as may be offered at the hearing hereof.

MEMORANDUM

A magistrate judge may release a person pending the determination of a petition for the revocation of the person's supervised release upon a clear and convincing showing that the person will not flee or pose a danger to any other person or to the community. (Fed. R. Crim. P. 32.1(a)(6).)

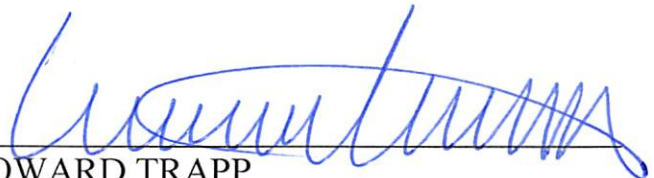
HEARING REQUEST

An evidentiary hearing is requested, and the time required for the presentation of evidence and arguments is approximately one hour.

Dated, Hagåtña, Guam,

May 10, 2016.

Respectfully submitted,



HOWARD TRAPP
For HOWARD TRAPP INCORPORATED
Attorney for Defendant

Reasons for Release:

A) ~~since~~ I believe I've shown that ~~myself~~ to be a productive member to the community by examples as:

- 1) I've obtained housing for myself/children since December of 2013. (Note: I was only two months back & still on parole)
- 2) I've held employment till present day taking care of financial obligations.
- 3) Been responsible as to meeting w/ assigned aftercare.
- ~~4) I've refrained from~~

B) I've recently been able to reunite ~~at~~ my family ~~again~~

- 1) we currently are receiving couples therapy & family sessions
- 2) I have goals to be met that I've realistically set for myself like starting a small business in auto service & food service or both.
- 3) I don't want to be another number to add to the rate of recidivism.

3 Life attempt?

- As of ^{early} mid March, I've been negative in UA testings.
- I received medical attention as to what I've been struggling w/ (Depression) & have shown major progress.
- I value life unconditionally & the many blessings it holds. My family, other hold. children, & freedom.

EXHIBIT A

Bottom line: I'm doing what I should be doing to move forward in a positive/healthy way. Yes I've had a few bumps in my ~~walk~~ road, & I'm working on taking one addressing it & solving it. I see my life ahead of me being happy & successful & a productive member of society. However, I can't be any of that if I was remain idle or stagnant as a detainee/inmate. I can make anyone proud. I will prove & show myself that I can do it.

Reasons for Release:

- A) I believe I've shown that I can be a productive member to the community by examples as:
- B)
 - 1) I've obtained housing for myself/children since December of 2013. (Note: I was only two months back & still on anklet)
 - 2) I've held employment til present day taking care of financial obligations.
 - 3) Been responsible as to meeting w/ assigned aftercare.
- C) I've recently been able to reunite my family
 - 1) We currently are receiving couples therapy & family sessions
- D) I have goals to be met that I've realistically set for myself like starting a small business in auto service & food service or both.
- E) I don't want to be another number to add to the rate of recidivism

___ As of early/mid March, I've been negative in UA testing.

___ I received medical attention as to what I've been struggling w/ (depression) and have shown major progress.

___ I value life unconditionally & the many blessings it holds. My family, other half, children, & freedom.

Bottom line: I'm doing what I should be doing to move forward in a positive/healthy way. Yes I've had a few bumps in my walk & I'm working on addressing it and solving it. I see my life ahead of me being happy & successful & a productive member of society. However, I can't be any of that if I was remain idle or stagnant as a detainee/inmate. I can make everyone proud. I will prove & show myself that I can do it.

EXHIBIT B



2nd Floor Ocean Plaza Bldg. Tumon, GU 96913 | 671-649-TACO

May 10, 2016

The Honorable Joaquin V.E. Manibusan
Magistrate Judge
District Court of Guam
520 West Soledad Avenue
Third Floor
Hagatna, Guam 96910

Re: United States v. Joshua J.C. Ulloa, Criminal Cases Nos. CR 07-00111 and 08-00013,
District Court of Guam

Dear Judge Manibusan,

I own the Desperado restaurant. It is located in Tumon. Joshua J.C. Ulloa is an employee. He is a chef. I fully understand that Mr. Ulloa is detained. Mr. Ulloa's job, however, is waiting for him. His employment would resume upon his release.


Phillip Martineau

EXHIBIT C